

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

MASSACHUSETTS NURSES ASS'N,

Plaintiff,

v.

NATIONAL NURSES UNITED, AFL-CIO,

Defendant.

Case No. 1:15-cv-11804-WGY

**JOINT CONSENT TO SUBMIT CASE ON STIPULATED RECORD**

The parties stipulate that the Court may treat the pending cross-motions for summary judgment [Docs. 25-40] and the record there attached as a stipulated record for bench decision. The parties agree that in resolving the cross-motions for summary judgment, the Court may resolve any disputed factual issues as though the matter were submitted at a bench trial. *See South Kingstown School Committee v. Joanna S.*, 773 F.3d 344, 349 n.2 (1st Cir. 2014); *Federacion de Empleados del Tribunal General de Justicia v. Torres*, 747 F.2d 35, 36 (1st Cir. 1984).

November 30, 2015

Respectfully submitted,

/s James F. Lamond  
James F. Lamond  
McDonald Lamond Canzoneri  
352 Turnpike Road, Suite 310  
Southborough, MA 01772-1756  
(508) 485-6600  
[jlamond@masslaborlawyers.com](mailto:jlamond@masslaborlawyers.com)  
Attorneys for Plaintiff Massachusetts Nurses Ass'n

/s/ Michael T. Anderson  
Michael T. Anderson (BBO #645533)  
MURPHY ANDERSON PLLC  
111 Devonshire Street, 5th Floor  
Boston, MA 02019  
617.227-5720 (t)  
617.227.5767 (f)  
[manderson@murphypllc.com](mailto:manderson@murphypllc.com)

Attorneys for Defendant National Nurses United

### **CERTIFICATE OF SERVICE**

I hereby certify that on this date I served a copy of the foregoing document  
via the Court's ECF system on the following:

James F. Lamond  
McDonald Lamond Canzoneri  
352 Turnpike Road, Suite 310  
Southborough, MA -1772-1756

Dated: November 30, 2015

/s/ Michael T. Anderson